MATTHEW J. PLATKIN ATTORNEY GENERAL OF NEW JERSEY R.J. Hughes Justice Complex 25 Market Street, P.O. Box 080 Trenton, New Jersey 08625 Attorney for Defendants

By: Angela Cai (NJ Bar 121692014)

Deputy Solicitor General
609-414-5954
angela.cai@njoag.gov

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY CAMDEN VICINAGE

AARON SIEGEL, JASON COOK, JOSEPH DELUCA, NICOLE CUOZZO, TIMOTHY VARGA, CHRISTOPHER STAMOS, KIM HENRY, AND ASSOCIATION OF NEW JERSEY RIFLE AND PISTOL CLUBS, INC.,

Plaintiffs,

V.

MATTHEW J. PLATKIN, in his official capacity as Attorney General of the State of New Jersey, PATRICK J. CALLAHAN, in his official capacity as Superintendent of the New Jersey Division of State Police,

Defendants.

Hon. Karen M. Williams, U.S.D.J. Hon. Ann Marie Donio, U.S.M.J.

Docket No. 22-CV-7463

NOTICE OF EXPEDITED MOTION FOR CONSOLIDATION

RONALD KOONS; NICHOLAS
GAUDIO; JEFFREY M. MULLER;
SECOND AMENDMENT FOUNDATION;
FIREARMS POLICY COALITION, INC.;
COALITION OF NEW JERSEY
FIREARM OWNERS; and NEW JERSEY
SECOND AMENDMENT SOCIETY,

Plaintiffs,

v.

WILLIAM REYNOLDS in his official capacity as the Prosecutor of Atlantic County, New Jersey; GRACE C.
MACAULAY in her official capacity as the Prosecutor of Camden County, New Jersey; ANNEMARIE TAGGART in her official capacity as the Prosecutor of Sussex County, New Jersey; MATTHEW J.
PLATKIN, in his official capacity as Attorney General of the State of New Jersey; and PATRICK CALLAHAN, in his official capacity as Superintendent of the New Jersey State Police,

Defendants.

TO: United States District Court
District of New Jersey – Camden Vicinage
Mitchell H. Cohen Building & U.S. Courthouse
Camden, NJ 08101

Daniel L. Schmutter, Esq. HARTMAN & WINNICKI, P.C. 74 Passaic St.

Hon. Rene Marie Bumb, U.S.D.J. Hon. Elizabeth A. Pascal, U.S.M.J.

Docket No. 22-CV-7464

Ridgewood, NJ 07450

David Jensen DAVID JENSEN PLLC 33 Henry Street Beacon, New York 12508

William Reynolds Office of the Atlantic County Prosecutor 4997 Unami Blvd, Mays Landing, NJ 08330

Grace C. Macaulay Office of the Camden County Prosecutor 200 Federal St, Camden, NJ 08103

Annemarie Taggart Office of the Sussex County Prosecutor 19 High St #21, Newton, NJ 07860

PLEASE TAKE NOTICE that the undersigned, Defendants Matthew J. Platkin, Attorney General of New Jersey and Patrick Callahan, Superintendent of the New Jersey State Police, Angela Cai, Deputy Solicitor General, appearing, move before this Court for an expedited order consolidating *Koons v. Reynolds*, No. 22-cv-7464, with *Siegel v. Platkin*, No. 22-cv-7463, pursuant to Federal Rule of Civil Procedure 42(a) and Local Civil Rule 42.1.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the attached Brief in support of the Motion. A proposed Order is enclosed.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 42.1, a copy of a cover letter accompanying this Motion shall be electronically filed on the court's docket in No. 22-cv-7464.

PLEASE TAKE FURTHER NOTICE that oral argument is not requested.

MATTHEW J. PLATKIN ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Angela Cai

Angela Cai (NJ Bar 121692014)
Deputy Solicitor General

Dated: December 23, 2022